

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Ronald G. Linaburg,)	
)	Bankruptcy No. 20-22898-CMB
Debtor.)	Chapter 11
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Ronald G. Linaburg,)	
)	
Movant,)	
)	Document No.
v.)	
No Respondents,)	
)	
Respondent.)	
)	

**MOTION FOR ORDER EXTENDING TIME TO FILE AMENDED CHAPTER 11 PLAN
AND AMENDED DISCLOSURE STATEMENT**

AND NOW comes the Debtor, by and through its attorney, Brian C. Thompson, Esquire, Thompson Law Group, P.C., and files this Motion for Order Extending Time to File Amended Chapter 11 Plan and Amended Disclosure Statement representing as follows:

1. On March 29, 2021, Debtor filed his Chapter 11 Plan of Reorganization, Disclosure Statement, and Summary of Plan
2. On June 3, 2022, Debtor filed an Amended Chapter 11 Plan and Amended Disclosure Statement. *See ECF # 602, 603.*
3. On August 25, 2022, this Court entered a text Order directing Debtor to file an Amended Disclosure Statement and, if needed, Amended Chapter 11 Plan on or before September 6, 2022.
4. Debtor has made progress related to the filed objections to the previously filed Amended Disclosure Statement.

5. Additionally, Debtor and PNC Bank continue to pursue a resolution of their disputes.

One mediation session was completed with some progress, and a second session has been scheduled.

6. Given the fact that the pending matters being negotiated between Debtor and the objecting parties would materially impact the terms of the Amended Disclosure Statement and Chapter 11 Plan, Debtor avers that it would not be efficient to file an amended disclosure statement and chapter 11 plan at this time.

WHEREFORE, Debtor respectfully requests that this Court enter an order extending the time for Debtor to file his Amended Chapter 11 Plan and Amended Disclosure Statement for thirty (30) days.

Respectfully submitted,

Dated: September 7, 2022

/s/Brian C. Thompson, Esquire
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